IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

J & J SPORTS PRODUCTIONS, INC.	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 3:15-CV-537
v.	)	
	)	
PACHECOS, INC,	)	
	)	
Defendant.	)	
	)	

ANSWER

Defendant Pachecos, Inc., ("Pacheco's) by and through counsel, respectfully submits this Answer to the Complaint filed in this action.

Responding to the corresponding numbered allegations of the Complaint, Pachecos states:

1. The allegations of paragraph 1 state a legal conclusion to which no response is required. To the extent that a response may be required, the allegations are denied.

2. The allegations of paragraph 2 state a legal conclusion to which no response is required. To the extent that a response may be required, the allegations are denied. However, Pachecos admits the jurisdiction of this Court.

3. The venue of this court is admitted.

4. Pachecos is without knowledge sufficient to form a belief as to the truth of the allegations of paragraph 4, so those allegations are denied.

5. Pachecos admits that it owns the business known as Pancho Villa Mexican Restaurant located at 10500 Spotsylvania Avenue, Fredericksburg, Virginia, but denies that such

location is its principal place of business. Pachecos has no knowledge of John Doe or any actions such party may have taken.

6. Pachecos is without knowledge sufficient to form a belief as to the truth of the allegations of paragraph 6, so those allegations are denied.

7. Pachecos is without knowledge sufficient to form a belief as to the truth of the allegations of paragraph 7, so those allegations are denied.

8. Pachecos is without knowledge sufficient to form a belief as to the truth of the allegations of paragraph 8, so those allegations are denied.

9. Pachecos is without knowledge sufficient to form a belief as to the truth of the allegations of paragraph 9, so those allegations are denied.

10. Pachecos is without knowledge sufficient to form a belief as to the truth of the allegations of paragraph 10, so those allegations are denied.

11. Pachecos is without knowledge sufficient to form a belief as to the truth of the allegations of paragraph 11, so those allegations are denied.

12. Pachecos is without knowledge sufficient to form a belief as to the truth of the allegations of paragraph 11, so those allegations are denied.

13. Denied.

14. Denied.

15. Denied.

16. Denied.

17. Admitted.

18. Pachecos incorporates its responses to the allegations of paragraphs 1-7 as fully as if restated.

19. The allegations of paragraph 19 do not require a response.

20. Denied.

21. Admitted.

22. Denied.

23. Denied.

24. Denied.

25. Pachecos incorporates its responses to the allegations of paragraphs 1-7 as fully as if restated.

26. The allegations of paragraph 19 do not require a response.

27. Denied.

28. Admitted.

29. Admitted.

30. Pachecos is without knowledge sufficient to form a belief as to the truth of the allegations of paragraph 30, so those allegations are denied.

31. Denied.

32. Denied.

Any allegations of fact requiring a response which have not been expressly admitted or denied are hereby denied.

WHEREFORE, Defendant Pachecos, Inc. respectfully requests that it be awarded judgment in its favor with respect to Plaintiff's claims, and that it be awarded its costs and reasonable attorneys fees.

Dated: October 29, 2015

Respectfully submitted,

GOLDMAN & VAN BEEK, P.C.

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CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of October, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all persons who have registered to receive electronic service. In addition, I sent a true copy of the foregoing via first-class mail, postage prepaid to:

W. Brian McCann, Esq.
The McCann Law Firm, PLLC
4114 East Parham Road, Suite B
Richmond, Virginia 23228

/s/
Neil D. Goldman